



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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JUN 10 2014

Ref: 8EPR-N

Bill Avery, Forest Supervisor
Helena National Forest
2880 Skyway Drive
Helena, MT 59601

Re: Divide Travel Plan Draft Environmental Impact
Statement, CEQ # 20140069

Dear Mr. Avery:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Divide Travel Plan Draft Environmental Impact Statement (EIS) prepared by the USDA Forest Service (USFS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA). Section 309 of the Clean Air Act directs the EPA to review and comment in writing on the environmental impacts of any major federal agency action. As provided in more detail at the end of the letter, our review has resulted in a rating of EC-1 (Environmental Concerns – Adequate Information).

Project Background

The Helena National Forest (HNF) is proposing changes to the existing system of designated motorized public access routes and prohibitions within the Divide travel planning area for wheeled and over-snow motorized vehicles. This Draft EIS describes the anticipated direct, indirect, and cumulative environmental impacts that would result from the proposed changes and from the three alternatives. The area this travel plan includes is approximately 155,500 acres of National Forest System (NFS) lands and lies within Lewis and Clark and Powell Counties in the state of Montana.

The Divide Travel Plan Decision will include only open or closed determinations; decommissioning would not be specified in this decision. Any decommissioning action resulting from this planning decision would require additional NEPA analysis. None of the alternatives would prohibit non-motorized activities. The proposed changes would determine where wheeled and over-snow motorized vehicles could access the Forest System roads and trails.

Comments and Recommendations

The EPA supports the HNF's efforts to analyze changes to the existing motorized public access routes within the Divide travel planning area for wheeled and over-snow motorized vehicles. We also understand the usefulness of being consistent with adjacent forest plans where roads connect. The Draft

EIS appears to present many trade-offs as related to potential environmental impacts. For instance, more roads will be open to motorized over-snow vehicles, but the time period for this type of motorized access will be shortened. In addition, a number of the roads being opened for this use are within areas where motorized over-snow vehicles are already allowed next to the roads. Therefore, our comments are focused on the broader water quality impact of the general actions.

The Draft EIS states that there are no effects or no easily quantifiable indirect effects of the decision on water resources and no effort has been made to estimate sediment delivery from the road network under each alternative. The Draft EIS also recognizes that unpaved roads are a dominant source of sediment in streams and that roads crossing or running alongside streams generally deliver higher sediment to streams than roads without a hydraulic connection to a stream channel (page 148). As shown in Draft EIS Tables 3.19 and 3.20 there are a number of streams that have a large number of road crossings and many of these streams are already listed by the Montana DEQ as impaired due to sediment.

We are concerned that there is appropriate monitoring of roads, especially the roads with numerous stream crossings, to determine when the road use has an increased negative impact on nearby streams. Additionally, we are concerned about whether there is sufficient maintenance of roads so as to limit the runoff and sedimentation impacts to nearby streams. For instance, there are three roads that will remain closed until stream crossing bridges or culverts can be constructed. We recommend that the Final EIS indicate how the USFS will assure that these roads will not be used by motorized vehicles until this work is completed and indicate the plan for funding and constructing the needed bridges or culverts, including the time of such work.

We also recommend the Final EIS provide additional information on the monitoring of roads, such as the criteria used for evaluating the effects of motorized routes on water quality and any changes that may result from the change of uses outlined in the Draft EIS. The Final EIS could also provide more clarity on the mitigating measures the USFS has already implemented, or will implement, to minimize the sedimentation impact to streams.


The EPA supports the USFS in moving forward with the decommissioning of closed roads to remove them from the landscape, which should have a positive impact on streams near these roads. Additionally, we encourage the USFS to take steps to prevent the use of the roads and trails not designated as system routes and move these unauthorized routes into decommissioning.

Rating

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this Draft EIS as Environmental Concerns- Adequate Information, (EC-1). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "1" rating means the Draft EIS provides adequate information and analyses to disclose project impacts. A full description of the EPA's rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

If you have any questions or would like to discuss our concerns in more detail, please contact me at (303) 312-6704. You may also contact Lisa Lloyd, NEPA lead reviewer, at (303) 312-6537 or by email at lloyd.lisa@epa.gov.

Sincerely,

for 

Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Ecc: Heather DeGeest, USFS

